

E-filed 5/21/07

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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,)	No. CR 07-00187 JF
)	
12 Plaintiff,)	STIPULATION TO CONTINUE
)	HEARING AND EXCLUDE TIME;
13 v.)	[PROPOSED] ORDER
)	
14 DANIEL ERNESTO RANGEL-MARTINEZ,)	
)	
15 Defendant.)	
16 _____)	

17 Defendant and the government, through their respective counsel, hereby stipulate that,
18 subject to the court's approval, the hearing in the above-captioned matter, presently scheduled for
19 Wednesday, May 23, 2007, be continued to Wednesday, June 13, 2007, at 9:00 a.m.

20 The continuance is requested because the defense requires additional time for
21 investigation.

22 The parties further agree that time should be excluded under the Speedy Trial Act because
23 the defense requires time for effective preparation and investigation, and the ends of justice
24 outweigh the defendant's and the public's need for a speedy trial.
25
26

1 Dated: 5/18/07

/s/
LARA S. VINNARD
Assistant Federal Public Defender

3 Dated: 5/18/07

/s/
BENJAMIN KENNEDY
Assistant United States Attorney


5
6 **ORDER**

7 The parties have jointly requested a continuance of the hearing set for May 23, 2007, to
8 allow time for the defense to continue investigation.

9 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the hearing date
10 presently set for May 23, 2007, be continued to June 13, 2007, at 9:00 a.m.

11 Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time
12 from May 23, 2007, to June 13, 2007, shall be excluded from the period of time within which
13 trial must commence under the Speedy Trial Act, 18 U.S.C. § 3161 et seq.

14 Dated: 5/21/07

15 
JEREMY FOGEL
United States District Judge